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19 GOOGLE LLC

20 UNITED STATES DISTRICT COURT
21 NORTHERN DISTRICT OF CALIFORNIA
22 SAN JOSE DIVISION

23 AMBASSADOR MARC GINSBERG and) CASE NO.: 5:21-CV-00570-BLF
24 COALITION FOR A SAFER WEB,)
25 Plaintiffs,) **JOINT STIPULATION AND**
26 v.) **[PROPOSED] ORDER TO EXTEND**
27 GOOGLE LLC,) **GOOGLE LLC'S DEADLINE TO**
28 Defendant.) **FILE REPLY IN SUPPORT OF ITS**
29) **MOTION TO DISMISS**

30 _____) Judge Beth Labson Freeman

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JOINT STIPULATION

Plaintiffs Marc Ginsberg and the Coalition for a Safer Web (collectively, “Plaintiffs”), and Defendant Google LLC, erroneously sued as Google Inc. (“Google”), jointly submit this stipulation to extend Google’s deadline to file a reply in support of its motion to dismiss.

WHEREAS, Plaintiffs filed their complaint (ECF 1) on January 25, 2021;

WHEREAS, Google filed a motion to dismiss the complaint (ECF 14) on April 22, 2021;

WHEREAS, in lieu of filing an opposition to Google’s motion to dismiss, Plaintiffs filed their first amended complaint (the “FAC”) on June 8, 2021 (ECF 17) and a corrected FAC on June 11, 2021 (ECF 19);

WHEREAS, pursuant to the stipulation of the parties (ECF 18) granted by this Court (ECF 21), Google's deadline to respond to the FAC was July 13, 2021;

WHEREAS, Google filed a motion to dismiss the FAC (ECF 23) on July 13, 2021;

WHEREAS, pursuant to the stipulation of the parties (ECF 24) granted by this Court (ECF 25), the briefing schedule for Google’s motion to dismiss set a deadline for Plaintiffs’ opposition on September 13, 2021 and Google’s deadline for submitting a reply brief in further support of its motion was due November 15, 2021 (64 days after Plaintiff’s opposition);

WHEREAS, on August 11, 2021, in response to Plaintiffs' motion requesting an emergency continuance (ECF 26), the Court stayed the case for 30 days (to September 10, 2021) based on Plaintiff's counsel's health emergency;

WHEREAS, as required by the Court's order (ECF 27) granting the stay, Plaintiffs submitted a status report (ECF 28) requesting an additional stay pending resolution of the appeals in *Taamneh v. Twitter, et al.*, No. 18-17192, *Gonzalez v. Twitter, et al.*, No. 18-16700, and *Clayborn v. Twitter, et al.*, No. 19-15043, and Google filed a response to Plaintiffs' status report (ECF 29) objecting to the grant of an open-ended stay in this matter;

WHEREAS, on September 14, 2021, the Court issued an order (ECF 30) extending the stay in this case through October 14, 2021;

WHEREAS, when the stay expired, the Court issued an order (ECF 31) requesting that Plaintiffs submit a status report and propose a briefing schedule for Google's motion to dismiss;

1 WHEREAS, Plaintiffs submitted a status report (ECF 32) stating that they “intend to file
2 their Opposition to Defendants’ motion to Dismiss Plaintiffs’ First Amended Complaint before
3 November 5, 2021[;]”

4 WHEREAS, the Court issued an order (ECF 33) setting a briefing schedule for Google’s
5 motion to dismiss whereby Plaintiffs’ opposition to the motion to dismiss is due November 5,
6 2021, and Google’s reply to Plaintiffs’ opposition is due November 12, 2021;

7 WHEREAS, Plaintiffs’ counsel and Google’s counsel have agreed to an extension of
8 Google’s deadline to file its reply to November 19, 2021;

9 WHEREAS, the parties submit that this one-week extension is appropriate in light of the
10 amount of time Plaintiffs have had to prepare the opposition to the motion to dismiss (nearly four
11 months); the modest extension will permit Google sufficient time to reply to Plaintiffs’ opposition;
12 and because such extension will not delay the hearing of December 16, 2021 on the motion to
13 dismiss the FAC;

14 THE PARTIES HEREBY STIPULATE AND AGREE, subject to the Court’s approval, to
15 the following:

16 1. Google’s deadline to submit its reply in further support of its motion to dismiss the FAC
17 shall be extended from November 12, 2021 to November 19, 2021.

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19 Respectfully submitted

20 Dated: November 2, 2021

21 WILSON SONSINI GOODRICH & ROSATI
22 Professional Corporation

23 By: /s/ Meng Jia Yang
24 Meng Jia Yang
25 mjyang@wsgr.com

26
27 *Attorneys for Defendant*
28 GOOGLE LLC

1 Dated: November 2, 2021

THE LAW OFFICE OF KEITH ALTMAN

2 By: /s/ Keith Altman

3 Keith Altman

4 kaltman@lawampmmt.com

5 *Attorneys for Plaintiffs*

6 AMBASSADOR MARC GINSBERG and
COALITION FOR A SAFER WEB

7 **SIGNATURE ATTESTATION**

8
9 I, Meng Jia Yang, hereby attest that all other signatories listed, and on whose behalf the
10 filing is submitted, concur in the filing's content and have authorized the filing of this e-filed
11 document.

12 By: /s/ Meng Jia Yang

13 Meng Jia Yang

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15 PURSUANT TO STIPULATION, IT IS SO ORDERED

16
17 Dated: November 2, 2021



18 Honorable Beth Labson Freeman
United States District Court Judge

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